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November 24, 2020

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VIA ECF

The Honorable Gabriel W. Gorenstein
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Ulku Rowe v. Google LLC*, Case No. 19-cv-08655 (LGS)(GWG)

Dear Judge Gorenstein:

We represent Defendant Google LLC in the above-referenced matter and write in response to Your Honor's Memorandum Endorsement of today (ECF No. 63). Defendant will rely on its November 23, 2020 letter (ECF No. 62) as its opening brief seeking an order that the deposition not proceed. The parties have conferred and agreed on the following briefing schedule:

- Deadline for Plaintiff to submit an opposition brief: December 1, 2020;
- Deadline for Defendant to submit a reply brief: December 4, 2020.

Should the Court determine that the disputed deposition move forward, the parties agree to seek a brief extension to complete depositions in this matter from the current deadline of December 4, 2020, to December 18, 2020, to accommodate the deponent's schedule. The parties believe that this brief adjournment will not impact any other deadlines in the matter.

We thank the Court for its continued attention to this matter.

Respectfully submitted,


Kenneth W. Gage
of PAUL HASTINGS LLP

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